



**2023**

**Environmental, social  
and governance report**

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# Statement from our CEO

At Pulsant, we work to do right by our people and our planet. While we celebrate many areas of progress over the past year, the global context remains challenging with conflict and extreme weather, which are clear reminders of our need to act. Growing demand in our industry, in part from AI technologies, increases pressures resulting from construction, resource and land use, energy grid constraints, and skills shortages, and we can only deal with these challenges effectively by maintaining sustainability at the heart of our business.

Delivering local services to our clients can help them to avoid the inefficiencies of in-house environments. In pursuing sustainable growth of our regional edge platform, we are investing in saving energy and working to make intelligent choices to get the best out of our teams and resources, such as by delivering new spaces within existing buildings at our Rotherham YH-1 and Manchester NW-1 locations. Infrastructure upgrades across our estate have resulted in an improvement in energy efficiency as well as an absolute drop in electricity usage. 2024 plans bring further investment and growth as part of a multi-year strategy, and in accordance with our decarbonisation plan, we target a fall in greenhouse gas emissions.

To help our teams be at their most effective, we have consolidated our service offerings. We now focus on what we do best; our colocation, connectivity and cloud services.

Migrating clients to our new Pulsant Cloud brings workloads on to our most modern and energy-efficient hardware, realising economies of scale and enabling us to power down less efficient legacy platforms. We also withdrew our workplace recovery and other non-core services, and in simplifying the challenges for our teams we are better placed to deliver platformEDGE™ to the highest standards.

We need cohesive, diverse and well-supported teams, as well as the backing of the communities in which we operate. The appointment of our Chief People Officer to the board of directors, as well as recruiting a new Director of Talent, ensures the social aspects, including support and wellbeing of our people, has appropriate focus. Our new Edinburgh office brings our people together in a fantastic working environment, and I am proud that we are now hosting graduate and apprenticeship programmes to help us develop talent for the future.

Striving to operate a responsible business is complex but immensely rewarding. If we focus on maximising our resources, working effectively, and ensuring our people can be at their best, then we will drive business performance, as well as keeping our clients and our people on board. Our Pulsant Values and our Sustainability Commitments reach throughout our operations and business strategy, and I believe we will build on our progress in 2024.



**Rob Coupland**  
Chief Executive Officer

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**We now focus on what we do best; our colocation, networks and cloud**

# Working towards a sustainable planet

## Our impact and approach

In working towards a sustainable planet, we are making progress but have a long way to go. Our success is mutually dependent on wider shifts such as the decarbonisation of the power grids and value chain. As a technology business, our significant environmental impacts include electricity consumption, as well as upstream impacts of technology including mining and manufacturing of hardware and infrastructure. Our Science Based Targets underpin our decarbonisation strategy, and we are working to grow our awareness of broader nature-related impacts.

2023 results show that our data centres have become more efficient and reduced power consumption in absolute terms even while our business grows. On the other hand, we made significant investments last year by expanding capacity in our Rotherham YH-1 and Manchester NW-1 locations, as well as fitting out our new Edinburgh office, which has resulted in an increase in overall emissions in the scope 3 category. We remain within our target trajectory to achieve our 2030 decarbonisation goal.

### Greenhouse gas emissions since baseline 2019 against 2030 target trajectory

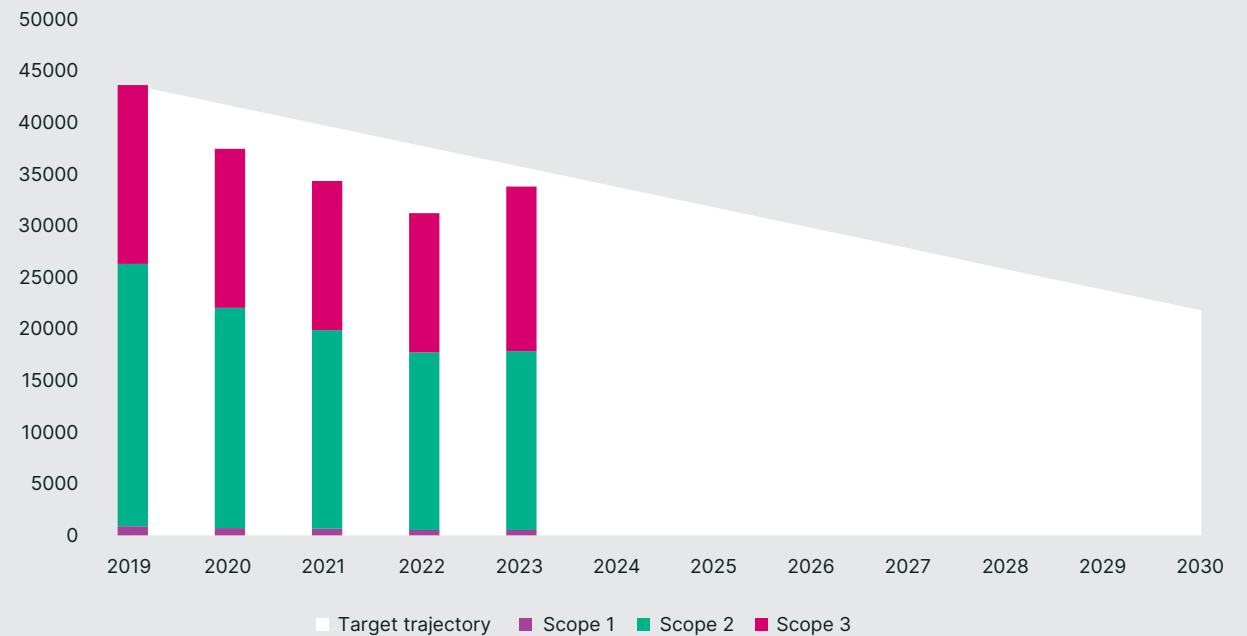


Figure 2 Greenhouse Gas emissions since baseline 2019 against 2030 target trajectory. This includes Reading SE-3 and Manchester NW-1 sites prior to acquisition. Electricity is reported using the location-based method.

## In 2023:

- Greenhouse Gas Emissions are 23% reduced since 2019, on track to our 50% emissions reduction target by 2030, though slightly increased relative to 2022
- Electrical power consumption is reduced by 6%, with efficiency (PUE) improving from 1.56 to 1.52, relative to 2022
- Zero environmental pollution incidents
- New ISO50001 certification covering all data centres, EcoVadis Silver medal & CDP Climate Change Disclosure Score of B

Looking towards 2024 and beyond we see changes to our operating context through moderately increasing demands for IT power density. While we are becoming more efficient in supporting our client's workloads, increased demand for power could grow the greenhouse gas impact of the data centre industry, despite UK electricity supplies becoming more renewable. Reaching our 2030 targets will in part depend on whether grid decarbonisation matches the pace of power demand, as well as our ability to invest in performance and capacity while minimising environmental impacts. We are continuing supportive engagement with our value chain, and developing our power strategy, to maximise our influence on these factors.

## 2023 emissions by source and category

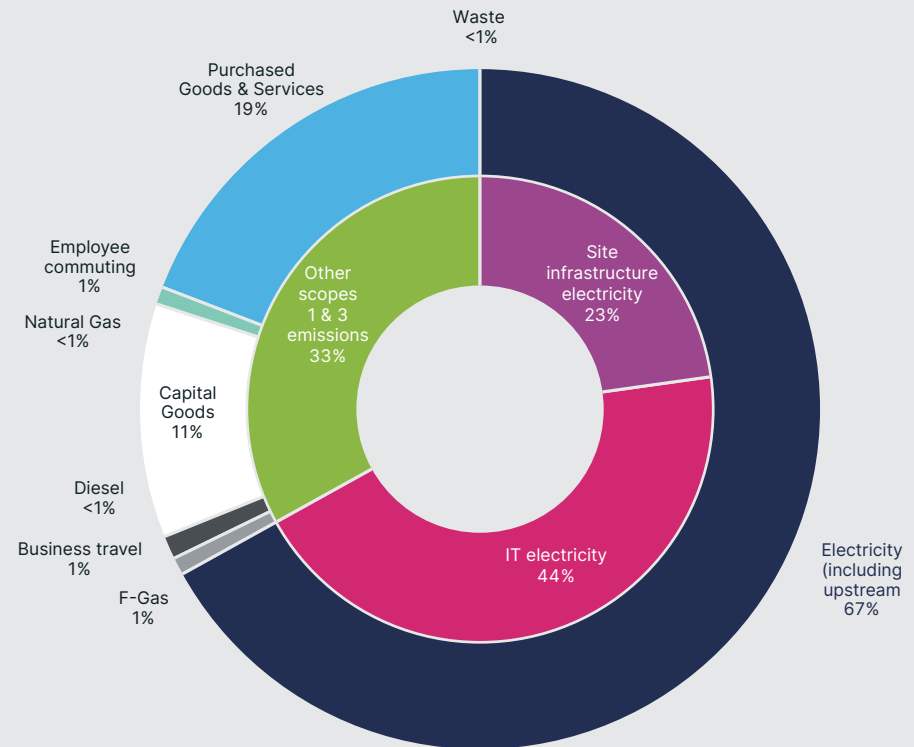


Figure 3 2023 emissions by source and category. Refer to [Appendix 1](#) for full data and methodology notes.

## Our commitments

We have defined the following set of commitments as a framework for our objectives and future disclosures. We are committed to achieve Net Zero by 2050 as defined by the Science-Based Target's initiative Net Zero Standard, including through:

### Emissions:

- Pulsant commits to achieve Net Zero by 2050 at the very latest in accordance with the Science Based Targets initiative's Net Zero Standard, which means
- Reducing our carbon emissions across all scopes by 50% by 2030 on an absolute basis from a 2019 baseline,
- Then continue to drive reductions across all scopes to achieve at least 90% reduction by 2050 and balance any remainder through supporting carbon removals.

### Efficiency:

- Meet or exceed the annual PUE target of 1.3 by 2030.
- Fully and transparently manage the lifecycle impact of each product and service by 2025.
- Offset 100% of our scope 1 greenhouse gas emissions through certified, good quality projects.
- Maintain our supply of 100% renewable electricity. In addition, actively exercise our buying power to support sustainable UK grid infrastructure and innovative power technologies.

### Value Chain:

- Make resource efficiency, disposal and carbon impact key considerations in procurement, and be an active participant in the circular economy.

### Culture:

- Together, make a positive difference to our environment and challenge ourselves to come up with creative solutions and outcomes to achieve enhanced sustainability.

### Governance:

- Hold ourselves accountable for meeting our environmental commitments. Deliver accountability through progressive improvement of our ISO14001-accredited management system and transparency of reporting.



## Renewable power

While we procure electricity on a renewable energy tariff, our supply is drawn from the UK grid. Every unit we can avoid will ease the pressure on local electricity demand. Therefore, we choose to measure our impact and drive power efficiencies through location-based electricity accounting method, at the same time as looking at how we can use our purchasing power to bring more renewables into the grid. Options we are evaluating further include the integration of physical Power Purchase Agreements into our power tariff, which helps us to directly support new green power.

The UK's target is to reach Net Zero electricity by 2035, subject to security of supply. This means balancing growing demand with increasingly dynamic supply, as well as upgrading transmission networks to ensure power can flow to the demand centres. We recognise there may be potential that data centres have to offer to support the energy decarbonisation journey.

Our sites in Edinburgh and Newcastle benefited in 2023 from average grid carbon intensities nearly seven times lower than those in London & South-East England<sup>1</sup>, and in operating regionally, we are providing cloud and colocation clients the opportunity to reduce their energy impact significantly. As well as geographical considerations, we are aware of innovations that may enable future data centres to support the grid, such as utilising battery storage capacity or providing waste heat. Through our industry body, TechUK, we support moves to develop a wider understanding of these opportunities and enable appropriate policy and regulatory support.

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### **As the UK grid decarbonises, we face new challenges and opportunities**

<sup>1</sup><https://www.nationalgrideso.com/data-portal/regional-carbon-intensity-forecast> Accessed 20/5/2024



## In our data centres

Our estate PUE was brought down from 1.56 to 1.52 during 2023; ahead of our target for the year of 1.53. Moreover, like-for-like power consumption was down 6%. We have had some great success stories through new infrastructure – such as the upgraded UPS at Newcastle NE-2 instantly cut site demand by 10%, but the most significant part of the improvement is related to changing our configurations. The exit of Maidenhead SE-2 Phase 1 building completed around the end of 2022, shifting client and internal workloads mainly to our SE-2 Phase 2 – 3. The consolidated demand on our infrastructure has led to clear gains in energy efficiency through 2023. We also saw improvements across the estate related to managing airflows, clearing excess cabling from underfloor voids, and installing containment.

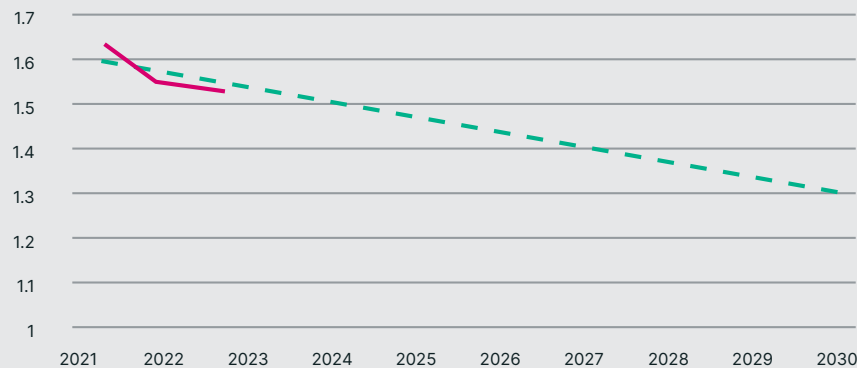
We have filled up with Hydrotreated Vegetable Oil (HVO) fuel at our Manchester NW-1 location following fit-out works and going forward will see lower standby power generation emissions. This fuel is sourced from waste fats and vegetable oils and has up to 90% lower emissions than mineral diesel, reflecting the consideration that biomass-derived combustion of carbon is circular; with carbon released balanced out through the carbon absorbed in the growth of new crops. We have taken steps in procurement to avoid deforestation risks linked with palm oils.

FM200 elimination has been progressing, though we still have some way to go before we can be FM200-free. Meanwhile, we work to prevent gas release through maintenance inspections and risk management.

As a climate-related risk, we acknowledge water scarcity as an increasing concern, particularly for South-East England. At Pulsant, most of our sites do not actively consume water for cooling. However, we have improved our monitoring of consumption during 2023 as a basis for further risk-management. We also review impacts from water usage for any new cooling system investments as part of our Sustainable Cooling Procurement Standard.

### The consolidated demand on our infrastructure has led to clear gains in energy efficiency through 2023

Estate-average power usage effectiveness (pue) v 2030 target trajectory





## In our services

Our **Pulsant Cloud** service is built to consolidate high volumes of clients and VMs onto robust and modular hardware that brings energy-efficiency, cost-efficiency and hardware-efficiency as compared to our legacy platforms. As we migrate clients, we have been able to power off devices and create power savings. In addition, we implemented a programme of server operating mode review during 2023, which has already allowed us to save 16kw by implementing dynamic power modes across 185 servers.

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actions taken by our people to support nature as part of our Green Challenge

In our **connectivity** services, the environmental impacts outside of our data centres are largely determined by upstream providers. Looking upstream, 30% of our greenhouse gas footprint is derived from our demand for goods and services. We actively monitor and review 75 of our most environmentally significant vendors, identified on the basis of strategic importance, spend or sector environmental risk. As of the end of 2023, 28% have near-term Science Based Targets. Another 19% are either committed to developing Science Based Targets or claim to have aligned their targets with these trajectories, with the remaining 53% having not publicly committed to this level of ambition. We continue to engage with these suppliers and vendors on a targeted basis, with questions based on our review of their

sustainability performance against expectations specific to their sector. We also maintain a screening process to identify environmental risks and opportunities associated with new capital works and ensure that energy efficiency and sustainability is a key consideration.

In 2023, we delivered internal awareness sessions to highlight the wider environmental impacts associated with technology hardware, including in relation to the extraction and processing of metals and minerals. While mining has a significant greenhouse gas intensity, it also impacts people, landscapes and ecosystems. The aim was to drive a focus on longevity, buying less, buying refurbished, and when buying new, making choices that support progress in integrating recycled materials. We have increased use of refurbished/remanufactured hardware across selected categories from 1 to 3.5%, and there is potential to take this further, such as through better internal hardware circularity. We also expect that the consolidation into Pulsant Cloud will allow us to reduce levels of cloud-related hardware consumption. Our decommissioned and securely erased hardware is handled by asset recovery providers, who prioritise resale and reuse where possible.

## Pulsant Cloud will allow us to reduce levels of cloud-related hardware consumption

We also ended our Workplace Recovery services during 2023; exiting our leased offices in Glasgow, Edinburgh and Stockton. This has had a small impact on our electricity and gas consumption. In the process of closing sites, we have donated good-quality IT hardware and furnishings to a charitable organisation.



### Inform & engage our people with 'Nature Week'

During September's Nature Week, we highlighted nature-related impacts of our business and lifestyles. We shared a series of daily topics such as Indigenous cultural connections to land, and the emerging prospect of deep-sea mining. We also ran a challenge to incentivise

taking some small actions for nature, such as saving energy, recycling, changing shopping habits, taking public transport and learning about our local biodiversity strategies. Participants were rewarded with a gift membership to Mossy Earth, who support rewilding projects locally and globally.

## Wider impact

For our people in 2023, our Edinburgh office move to the new Lochside location means we now operate from a recently renovated building with strong efficiency credentials, great public transport and cycling connections. In addition to our cycle-to-work scheme, we have also launched an electric vehicle salary sacrifice scheme to support switching away from fossil fuel vehicles. Our new green forums have also started up across our three main offices, making sure that people can keep updated about our strategy and actions. We have also held two challenging yet fulfilling volunteering days for our Edinburgh team, supporting the

Pentland Hills Regional Park rangers with tree care and path maintenance, as well as developing awareness of wider environmental issues with 'Nature Week' in September.

While we focus on reducing our emissions, we have also continued to work with Climate Impact Partners to offset the impact of our direct (scope 1) emissions in relation to 2023. These include clean water, micro renewables and clean cooking projects. All projects supported have been verified by the VCS and/or Gold Standard frameworks.

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**We have also continued to work with Climate Impact Partners to offset the impact of our direct (scope 1) emissions in relation to 2023**

## Environmental sustainability governance

Governance and accountability are key to our sustainability strategy. We engage with third party verification of our greenhouse gas statement aligned to ISO14064-3 audit standards, as well as disclose to CDP. In August, our data centres achieved ISO50001 Energy Management Systems certification, which holds us to account for maintaining our processes and approach to achieve energy efficiencies.



## Climate-related risks and opportunities

We have screened climate-related physical and transition risks based on near and long-term projections, including RCP8.5 where data is available. Physical considerations include:

- Extreme heat days
- Subsidence
- Wildfire
- Extreme rainfall
- Drought & water stress
- Coastal erosion/sea level rise
- Humidity changes
- Second-order physical risks such as critical supply failures

Our response to physical risks includes requiring higher ambient temperature ratings for new cooling infrastructure, making improvements to site infrastructure drainage management and building fabric monitoring, as well as ensuring climate-related risk is fully considered as part of strategic development and acquisition.

We also assess the potential for transitional risks and opportunities to arise from climate-related changes in:

- Regulation & taxes
- Electricity infrastructure and pricing models
- Operational cost changes
- Reputation & performance expectations
- Environmental legal disputes/violations

Any identified risks are subject to oversight at operational and executive-level risk committees.

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**We have screened climate-related physical and transition risks based on near and long-term projections**



# Supporting our people & communities

## Health and wellbeing

We are committed to championing the wellbeing and happiness of our people, creating an environment where they can be themselves and truly thrive. Through our benefits and a supportive People First culture, we prioritise the physical, mental, emotional, and social health of our people.

Based on feedback from our Wellbeing Survey in 2023, we have expanded our wellbeing programme to provide access to a wider range of resources, information and support covering mental, physical, and financial aspects. A key element is the introduction of health champions, a network of individuals who are passionate about health and wellbeing, who help us raise awareness of what's available, and ensure we continue to evolve the support we provide to ensure a positive workplace environment.

Our wellbeing survey told us that our people wanted to get moving, so we took part in a Route 66 Challenge where our people ran, cycled, walked and swam to cover the distance as part of a team and introduced 'Walk Wednesdays' to encourage people to get some lunchtime fresh air.

We invested further in recruiting and developing qualified Mental Health First Aiders who are trained to recognise, actively engage and support our people facing mental health challenges and all our People Leaders completed mental health training to help them recognise signs and support their teams. Our mental health support program was enhanced with a range of new resources and services to help our people to manage stress, anxiety, and other mental health concerns. We held several wellbeing webinars, including stress management, mental health and mindfulness training, and hosted external speakers and workshops. We also launched a new Employee Assistance Programme to provide independent support, advice, and counselling services to all our people right from day one and continued our financial wellness programmes providing resources and education to help our people manage their finances effectively, such as workshops on mortgage support and managing your pension.

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## We have expanded our wellbeing programme

## Our values

Our Values framework reflects how we want to work together in order to continue to build an even better place to work and deliver great service to our clients. Everyone is provided with guidance and examples on how the values can be applied, as well as training and further resources, and challenged to consider their own behaviours as part of the bi-annual performance review cycle. We recognise those who have shown strong examples of living our values.



People First



Own It



Make it Happen



Nurture & Grow



Together We Thrive

In October, we opened our new Edinburgh office, designed as an open space, with lots of opportunity for collaboration and connection. This is an energy-efficient building with good facilities for enabling our people to cycle to work, or to charge their electric vehicle following the introduction of our new scheme in 2023. This building also includes a wellness room which provides our people with a private area where they can escape from the hustle of the office to prioritise their well-being or a quiet place to pray.



Our people once again enjoyed the benefit of a company wellbeing day; an occasion giving as many individuals as possible across Pulsant time through an extended weekend and the chance to disconnect and prioritise self-care.

We have been recognised for our commitment to Health and Wellbeing in 2023, with two separate awards. The Better Health at Work Award (Bronze), which recognises the efforts of Northeast employers in addressing health issues within the workplace, including health campaigns on Physical Activity, Healthy Eating and Mental Health and the SME Employer of the Year for Workplace Wellbeing at the Inside Out Awards, which has a specific focus on Mental Health.



## Safety

Part of our “People First” value is to make sure that our People and everybody we work with is kept safe, above any other priorities. Health and Safety sits alongside quality, environment, information security and energy management inside the integrated management system we use to set priorities for the company.

We engage with our team on health and safety through nominated representatives across all sites, through company communication, training and documentation. Individuals can also raise concerns directly via our set of Speak-up channels, including a whistleblowing helpline.

**2023**

no serious accidents or injuries amongst our team

Health and safety checks are included in our engagement with suppliers and review to ensure risk assessments are suitable for all activities third parties carry out on our sites.

During 2023, we are pleased that we have not seen any serious accidents or injuries amongst our team or visitors to our site.

While in the last year the number of first-aid injuries increased considerably compared to prior years, we could not identify any root cause pattern in our safety arrangements that may have caused this, but believe it was down to a combination of more activity on our sites and more communication around the need to report accidents leading to more being logged.

## Diversity and inclusion

We maintain a strong commitment to promoting a diverse and inclusive workforce. Our approach is geared towards fostering a workplace where every individual feels valued, respected, and empowered to share their unique perspectives and talents and where they have a strong sense of belonging and can be themselves.

To fully understand our current landscape, we asked our people to complete an anonymous DE&I survey, designed to gather individual insights and a better understanding of how our people are feeling. This showed a strong NPS of 76%, on our question of whether people felt they could be themselves at work, something that is very important to us and building this sense of belonging will continue to be a focus.

To help support neurodiversity awareness in the workplace we partnered with a regional charity

to provide neurodiversity awareness sessions for all our people, as well as specific people leader training to enable greater support within.

As part of our commitment to enhance our reach and appeal to varying groups across a spectrum of backgrounds, cultures, and experiences, we acquired our sponsor license for ‘right to work’ authorisation. As part of this we commenced a review of the language within our job descriptions and adverts to enhance inclusivity and remove any bias and have built upon our recruitment processes.

We have started the process of reviewing and revising company policies and practices to ensure they promote equity and fairness in areas such as hiring, promotion, compensation, and performance evaluation.

### Our Health and Safety Performance

	2021	2022	2023
<b>Fatalities</b>	0	0	0
<b>RIDDOR reportable injuries</b>	0	0	0
<b>Lost time injuries</b>	0	1	0
<b>First aid Injuries</b>	2	5	12
<b>Near misses/Safety concerns reported</b>	7	5	7

## Training and development

Throughout 2023, we prioritised investing in the growth and development of our people. We have maintained our commitment to offering training, career development, and skill enhancement opportunities, empowering our people to grow both personally and professionally. This commitment is evident in the fact that 29% of positions were filled through internal mobility.

We introduced several new development initiatives tailored to the needs of our people leaders, including leadership development, and technical skills enhancement, as well as wellbeing and inclusion-related initiatives.

We placed a particular emphasis on developing our leadership with programmes designed to equip emerging leaders with the skills and competencies necessary to drive organisational success.

Throughout the year, we also held a series of personal and professional skill enhancement workshops open to all our people covering a wide range of topics such as 'Behaviour Change & Goal Setting', 'Powerful Presentations', 'Boosting Resilience', 'Empowering Introverts', 'Fearless

Feedback and Career Conversations'. These workshops provided individuals with practical tools and techniques to excel in their roles.

In recognition of the importance we place on the development of our people, towards the end of 2023, we welcomed a Director of Talent to our team, who will be instrumental in driving forward the prioritisation of training and development initiatives and developing a learning culture within Pulsant.

As part of our commitment to investing in the next generation of talent, in 2023 we launched our early careers programme and welcomed 11 graduates. The program provides an opportunity to launch their careers, gain practical experience, and contribute to the success of Pulsant. Through training, structured rotations and mentorship, our graduates are empowered to grow professionally and make a meaningful impact from day one. As we enhance our early careers programme, we look forward to welcoming apprentices into our Data Centres early in 2024.

Our onboarding process has been enhanced by implementing a structured two-week induction programme for all new starters, as well as a quarterly induction day, which provides them with the opportunity to meet and hear from our CEO and CPO while gaining a comprehensive overview of Pulsant and introduced a buddy scheme to help integrate new joiners into Pulsant. By providing structured support, fostering social connections, and facilitating knowledge transfer, the programme has helped our new hires to feel valued, empowered, and motivated to contribute to the company's success from day one.

We recognised and celebrated our peoples' achievements in training and development. Whether it was completing a certification, successfully implementing new skills, or demonstrating exceptional performance, our people were acknowledged for their dedication to personal and professional growth, and we saw some great examples of our 'Nurture & Grow' value.



**As part of our commitment to investing in the next generation of talent, in 2023 we launched our early careers programme and welcomed 11 graduates**



## Our social and community empowerment

Over the course of the year, we continued our social and community approach with our Giving Something Back programme. Through engagement programmes, fundraising, volunteer efforts, and partnerships with local organisations, we endeavoured to address social needs, promote inclusivity, and have an impact.

Our people continued to use their two charity days to support a charity or community group as an individual or as part of a team, to make a positive difference to others. This could have been helping out in local foodbanks for example or supporting the development of local pathways and conservation.

Holding a number of regional charity walks gave us a great opportunity to bring our people together, raising awareness in the fight for Mental Health, as well as raising £1613 for Mind.

Our work with a regional employment team helped us to remove barriers into providing meaningful employment for autistic adults and/or those with learning difficulties, and provide work experience for their people who want to gain employment in IT.

We donated some technical equipment in the form of laptops and desktop equipment to Families First NE and made charitable donations to charitable causes such as MacMillan, Children in Need and Save the Children.

Additionally, we matched our people's donations to Cash for Kids, providing gifts for children in need, ensuring a brighter Christmas morning for those who would otherwise go without.

### Responsible Supply Chains

As part of our ethical business commitments, we hold our suppliers to the same ethical and environmental standards as our own people and with that in mind issue a Code of Conduct to all of our suppliers setting out our expectations and carry out screening of all new suppliers before engaging in business with them. We review the performance of our supplier partners on a regular basis and aim to address any issues with their delivery or performance promptly.

To help us fulfil our commitment to the elimination of Modern Slavery from our supply chain, we have carried out a risk assessment to identify the products and services we procure that are most at risk of involving Modern Slavery. These are computing hardware, apparel, and cleaning, building and security services. Whilst we do not purchase large amounts in any of these categories, we have committed to carrying out more in-depth checks on the Modern Slavery prevention measures our suppliers in these areas take and have also trained the teams who are most likely to manage suppliers in these categories. This is a commitment we have renewed again for 2024.

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**We endeavoured to address social needs, promote inclusivity, and have an impact**





# Be a trustworthy business

## Good governance

Being a responsible and trustworthy business starts with the accountability at the top of the company. Our board includes an independent non-executive director and independent chairperson who provide independent input and oversight into the strategic running of the company. The board sets the company's strategic goals and receives regular reports on company performance and risk, including views of stakeholders.

The board delegates the day-to-day running of the company to the Senior Leadership team, which includes the CEO, CFO and CPO who are also board directors.

Our ISO 9001, 14001, 27001 and 50001 certified Integrated Management System guides us on the standards against which we measure ourselves. Expectations of company standards and behaviours of the Pulsant team and partners are clearly set out in a set of company policies which are maintained and reviewed regularly to ensure that all legal and regulatory requirements are incorporated.

## Speak-up channels and whistleblowing

To ensure that issues and concerns are raised, our people and partners have access to several speak-up channels. These are regularly communicated to our people and include an independently run whistleblowing helpline, which allows anonymous reporting of concerns.

This encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which our business is run. Details are also provided of escalation routes, including external authorities. Any matters raised are investigated thoroughly, promptly and in confidence, with the outcome of the investigation reported back to the individual who raised the issue.

## Ethical business behaviour

We take seriously our obligations to not facilitate illegal activity including tax avoidance, money laundering, bribery, or corruption. We have comprehensive Anti-Bribery and Corruption policies and supplier and client controls in place which are fully supported by executive leadership. Sanctions list checks and corporate criminal offence risk assessments are embedded into our operations.



## Protecting data & information

Protecting our clients and our own data and information is a key component of the service we provide. We have in place physical and cyber security controls to protect our sites and our services, which are regularly assessed as part of our integrated management system and aligned with ISO 27001, PCI-DSS physical security controls and NIST cybersecurity framework.

We protect the personal data of our people, clients and partners seriously and have strengthened our framework during 2023. Our in-house Cyber Security team continuously monitors and evaluates our systems ensuring client data remains secure and confidential. Details of the controls we apply across our business around security are available in our "Security and Trust" document, which forms part of our client assurance pack.

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**Protecting our clients and our own data and information is a key component of the service we provide**

## Managing risk

We operate a company-wide risk management programme that incorporates regular reviews of changes to the external business context, as well as internal performance data to ensure risks to the business are identified and required action plans agreed and put in place.

Where risks emerge in our supply chain, these are pro-actively managed through our supplier management programme. This includes checks of new suppliers prior to any commercial engagement, segmenting suppliers by criticality and risk and carrying out regular reviews of our suppliers' performance and compliance in alignment with their risk and criticality rating.

## Open communication

The trust of our clients is never taken for granted and we aim to be transparent about our performance, both with our clients and wider stakeholders. To help our clients track the performance of our services, we provide a public status page for our service uptime and outages ([status.pulsant.com](https://status.pulsant.com)).

Our client experience survey programme includes interaction-specific spots as well as in-depth surveys and gives us insight into how we can add more value for our clients and helped to shape our plans going forward.



## Providing a reliable service

We operate an ITIL-aligned service management processes, with a focus on robust change and risk management, incident response and problem management.

During 2023, we firmly established a dedicated Major Incident management team whose focus has been on leading the resolution of any client or business-impacting major incidents, including the communication to affected parties and the root cause analysis following the incident. This has supported our continuing low levels of service-impacting major incidents.

Our data centre sites are designed and built with the resilience of the service we provide in mind. This includes the assessment and mitigation of any environmental risks of each site. All sites are also equipped with infrastructure that provides resilience against grid power cuts, and failures of single instances of key equipment such as cooling and power backup. We run a programme of planned maintenance including specialist partners to keep our data centres in the best condition and level of service resilience.

Where a third party partner is used to deliver products and services directly, this will be indicated in the appropriate service schedule or service design, as an inherent feature of the service taken, or reflected in the client contract.

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## Our data centre sites are designed and built with the resilience of the service we provide in mind



## Assurance

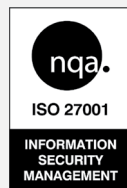
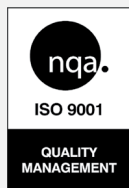
Pulsant operates a dedicated assurance team who report directly to the CFO. The Head of Risk and Assurance maintains oversight of governance systems throughout the business. Our specialist Cyber Security team, led by our Director of Cyber Security, provides technical expertise. The Head of Environment & Sustainability has specific responsibilities to oversee environmental performance and to drive our sustainability strategy throughout the business

To provide assurance around the controls we aim to apply, we run an internal audit programme as part of the management system to help support compliance against our standards and identify improvement opportunities.

This is complemented by a programme of external certification audits against a number of recognised standards, including ISO 9001, 14001, 27001 and 50001 and PCI-DSS physical security standards.

### Accreditations available per site

	ISO 9001	ISO27001	ISO14001	ISO9001	PCI-DSS
Croydon LN-1	✓	✓	✓	✓	✓
Edinburgh South Gyle SC-1	✓	✓	✓	✓	✓
Edinburgh SC-2	✓	✓	✓	✓	✓
Edinburgh SC-3	✓	✓	✓	✓	
Manchester NW-1	✓	✓	✓	✓	✓
Newcastle NE-1	✓	✓	✓	✓	✓
Newcastle NE-2	✓	✓	✓	✓	
Milton Keynes SE-1	✓	✓	✓	✓	✓
Maidenhead SE-2	✓	✓	✓	✓	✓
Reading SE-3	✓	✓	✓	✓	✓
Reading SE-4	✓	✓	✓	✓	✓
Rotherham YH-1	✓	✓	✓	✓	✓
Our Offices	✓	✓	✓	✓	



## Appendix 1: 2023 environmental data table and methodology

Environmental Data		2019	2022	2023
Electrical power consumption (kWh)		99,617,190	88,906,263	83,691,643
	Greenhouse gas emissions (tCO <sub>2</sub> e)	2019 (baseline)	2022 tCO <sub>2</sub> e (reduction % from baseline)	2023 tCO <sub>2</sub> e (reduction % from baseline)
<b>Scope 1</b>		<b>899</b>	<b>551 (39%)</b>	<b>523 (42%)</b>
	Diesel/gas-oil	137	108	101
	Fugitive emissions of F-gas	608	380	368
	Natural Gas	154	63	54
<b>Scope 2</b>	Electricity (location-based)	25,462	17,193 (32%)	17,330 (32%)
	Electricity (market-based)	4,739	2,475	81
<b>Scope 3</b>		<b>17,336</b>	<b>13,542 (22%)</b>	<b>15,958 (8%)</b>
	Business travel	233	92	168
	Capital Goods	3,736	2,413	3,566
	Employee Commuting	452	501	477
	Fuel- and Energy-Related Activities	6,034	6,097	5,374
	Purchased Goods & Services	6,881	4,436	6,362
	Waste Generated in Operations		2	2
	<b>Total greenhouse gas emissions</b>	<b>43,698</b>	<b>31,285 (28%)</b>	<b>33,811 (23%)</b>
	<b>Total location-based GHG intensity (tCO<sub>2</sub>e per £1000 revenue)</b>	<b>0.436<sup>2</sup></b>	<b>0.353</b>	<b>0.335</b>

<sup>2</sup> Intensity ratio excludes operations acquired by Pulsant post-2019, otherwise included in baseline GHG emissions

## Methodology

### Reporting protocols

This report has been prepared in accordance with the requirements of ISO14064-1.

### Reporting boundaries

This report covers Pulsant's operations as a regional provider offering colocation, cloud services, managed hosting and managed networks including all direct (Scope 1) and energy indirect (scope 2) emissions, and all significant indirect GHG emissions (Scope 3), including the following GHG Category inclusions and exclusions:

- Scope 1: Natural gas, diesel (standby power, company vans), fugitive FGas
- Scope 2: Electricity
- Scope 3:
  - Category 1 — Purchased goods and services: included
  - Category 2 — Capital goods: included
  - Category 3 — Fuel and energy-related activities (T&D and WTT for imported electricity, WTT for diesel)
  - Category 4 — Upstream transportation and distribution: excluded
  - Category 5 — Waste generated in operations: included
  - Category 6 — Business travel: included, excluding hotel accommodation
  - Category 7 — Employee commuting (including home working): included
  - Category 8 — Upstream Leased Assets: excluded as inapplicable
  - Category 9 — Downstream transportation and distribution: excluded
  - Category 10 — Processing of sold products: excluded as inapplicable
  - Category 11 — Use of sold products: excluded as inapplicable
  - Category 12 — End-of-life treatment of sold products: excluded as inapplicable
  - Category 13 — Downstream leased assets: excluded as inapplicable
  - Category 14 — Franchises: excluded as inapplicable
  - Category 15 — Investments: excluded as inapplicable

Scope 3 materiality screening has last been completed in relation to 2023 and will be reviewed every two years or following significant changes to business operations

### Base year selection

Pulsant has selected 2019 as the base year for the purposes of target-setting across scopes 1, 2 and 3, in order to avoid the impact of the COVID-19 pandemic in 2020 and 2021.

### Base year emissions recalculation policy

Pulsant shall recalculate base year emissions in line with the GHG Protocol Corporate Accounting & Reporting Standard in the case of acquisition or divestment resulting in a significant change to the organisational structure, i.e. greater than 5% impact on base year footprint. Gross base year emissions shall not be recalculated in case of outsourcing, since a common base year is used for scopes 1, 2 and 3. No changes were made to the base year emissions during 2023.

### Emissions factors used

Where available and in relation to UK operations, UK Government Conversion Factors are used for the relevant year. Supplementary factors used include Defra Table 13 Indirect Emissions from the Supply Chain (as adjusted for inflation), supplier-specific calculated emissions factors.

### Information on renewable electricity

Pulsant uses SSE Green Electricity which is 100% renewable electricity generated by wind and hydro assets in 2023 in the UK. It is fully backed by Renewable Energy Guarantees of Origin (REGOs) and independently verified by EcoAct, an Atos company (CDP Accredited Provider).

Using the GHG Protocol Corporate Standards' market-based approach the above enables us to report "0" emissions under Scope 2 in relation to power covered by this tariff.

## Methodology

### Information on the electricity consumption of co-location clients

Pulsant includes power consumed by client devices within leased colocation areas within Scope 2 power consumption data. This comprises approximately 46,839,554 kWh, as estimated based on a combination of point-in-time and actual metering throughout the year.

### Reason for the intensity measurement choice

Based on the nature of our business, as well as following the recommendations of the SECR legislation we chose sales revenue as it reflects the growth in our business performance.

### Estimation and uncertainty

This report contains estimations covering 3% of scope 1 and 0% of the total reported tCO<sub>2</sub>e value. Estimations have been required to present a complete picture where source data is unavailable and were calculated in line with the best available methods in reference to the GHG Protocol Accounting and Reporting Standard 2015. 30% of our total reported tCO<sub>2</sub>e value is subject to high qualitative uncertainty due to the use of spend-based industry carbon intensity factors in relation to Capital Goods, and Purchased Goods and Services.

### Data from suppliers

Pulsant has endeavoured to use supplier-specific data where feasible. Data provided by suppliers represents 10% of combined footprint in relation to purchased goods and services, and capital goods categories.

### Outside of scopes – biogenic emissions and removals

2023 direct biogenic emissions not included within the above consists of 0.6tCO<sub>2</sub>e in relation to biodiesel in company vehicle use. A further 9630tCO<sub>2</sub>e of biogenic CO<sub>2</sub> emissions is attributable to UK grid electricity usage. Biogenic CO<sub>2</sub> emissions are one of several activities labelled 'outside of scopes' by the GHG Protocol Corporate Accounting and Reporting Standard because the Scope 1 impact of these fuels has been determined to be a net '0' (since the fuel source itself absorbs an equivalent amount of CO<sub>2</sub> during the growth phase as the amount of CO<sub>2</sub> released through combustion).

### Mitigation activities

Data centre energy efficiency works as detailed above have improved the PUE metric from 1.56 to 1.52; resulting in a 421tCO<sub>2</sub>e reduction in scope 2 energy consumption relative to a scenario where 2023 operations had maintained the 2022 efficiency level.

### Restatements and changes to methodology

This report may contain restatements of data previously reported, as a result of material errors or from improvements to reporting methodology. Changes in this report include a data correction in relation to 2022 employee commuting emissions resulting in an increase of 205tCO<sub>2</sub>e.

## GHG verification statement

See link to download a copy of the third party limited assurance verification opinion statement relating to 2023 emissions data in this report.



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